

REMARKS

Claims 11-32 remain in the present application. Claim 17 is amended herein. Applicants respectfully submit that no new matter has been added as a result of the Claim amendments. Applicants respectfully request further examination and reconsideration of the rejections based on the amendments and arguments set forth below.

Claim Rejections – 35 U.S.C. §103

Claims 11-32 are rejected in the present Office Action under 35 U.S.C. §103(a) as being unpatentable over United States Patent Application Publication Number 2004/0048503 by Mills et al. (hereafter referred to as “Mills”) in view of United States Patent Application Publication Number 2002/0035574 by Dumas (hereafter referred to as “Dumas”). Applicants have reviewed the cited references and respectfully submit that the embodiments of the present invention as recited in Claims 11-32 are not rendered obvious by Mills in view of Dumas for the following reasons.

Applicants respectfully direct the Examiner to independent Claim 11 that recites a method for copying an application on a portable computer having a main memory and a removable memory, comprising (emphasis added):

updating a displayable category list to comprise a name of a category associated with said removable memory;
choosing an application of said main memory to copy;
changing a category name of said application from a category associated with said main memory to said category associated with said removable memory; and
in response thereto, automatically copying said application to said removable memory.

Independent Claims 17, 22 and 29 recite limitations similar to those of independent Claim 11. Claims 12-16 depend from independent Claim 11 and recite further limitations to the claimed invention. Claims 18-21 depend from

independent Claim 17 and recite further limitations to the claimed invention. Claims 23-28 depend from independent Claim 22 and recite further limitations to the claimed invention. Claims 30-32 depend from independent Claim 29 and recite further limitations to the claimed invention.

As acknowledged by the rejection, Mills fails to teach or suggest the limitations of “changing a category name of said application from a category associated with said main memory to said category associated with said removable memory” as recited in independent Claim 11. Applicants concur.

Applicants respectfully submit that Dumas, either alone or in combination with Mills, also fails to teach or suggest the limitations of “changing a category name of said application from a category associated with said main memory to said category associated with said removable memory” as recited in independent Claim 11. As recited and described in the present application, a category name of an application may be changed from a category associated with main memory to a category associated with a removable memory.

In contrast to the claimed embodiments, Applicants understand Dumas to teach categories associated with data. For example, Dumas teaches that data (e.g., listings of speakers, exhibitors, sponsors, etc. for a conference) may be organized into categories as shown by module 8 of Figure 2 of Dumas (paragraphs 39 and 52). As such, Dumas teaches away from the claimed embodiments by teaching categories associated with data types instead of categories associated with main memory and removable memory as claimed.

Additionally, Applicants understand Dumas to teach data transfer *without* changing a category name. For example, Dumas teaches transferring data from a remote database to a PDA, where the data is organized into the same categories on both the remote database and the PDA (paragraph 55). As such, Dumas teaches away from the claimed embodiments by teaching data transfer without a category name change instead of a changing a category name as claimed.

Applicants respectfully submit that Mills fails to teach or suggest the limitations of “updating a displayable category list to comprise a name of a category associated with said removable memory” as recited in independent Claim 11. As recited and described in the present application, a displayable category list is updated to comprise a name of a category associated with a removable memory.

In contrast to the claimed embodiments, Applicants understand Mills to teach that an expansion card may be coupled to a PDA (paragraph 35), where the PDA may include a display screen (paragraph 147). However, Applicants find no teaching or suggestion in Mills of the updating of a displayable category list to comprise the name of a category associated with a removable memory as claimed.

Furthermore, the rejection states on pages 4 and 5 in the “Response to Arguments” section that “[i]n the instant case Mill’s expansion card attaches to a displayable device and the content inside of the card is displayed when attach [sic] as demonstrated in applicant’s [sic] claim language.” Applicants wish to respectfully remind the Examiner that “the examiner should set forth in the Office

action: (A) the relevant teachings of the prior art relied upon, preferably with reference to the relevant column or page number(s) and line number(s) where appropriate” and “(B) the difference or differences in the claim over the applied reference(s)” (MPEP §706.02(j)). As such, a mere assertion that Mills teaches displaying data in response to attaching an expansion card does not provide Applicants sufficient guidance as to the relevant teachings of the prior art relied upon as required by the MPEP (e.g., with column and line number references), nor does it set forth the difference or differences in the claim over the applied reference. Therefore, Applicants respectfully request appropriate correction to the rejection.

Furthermore, the rejection states on page 4 in the “Response to Arguments” section that “[t]he expansion card holds data in a systematic fashion thereby employing some type of list and corresponding names as implied in applicant’s [sic] claim language.” Applicants would like to respectfully point out that independent Claim 11 does not recite “some type of list.” Instead, Claim 11 recites a category list which is updated to comprise a name of a category associated with a removable memory, which Applicants respectfully submit that Mills fails to teach or suggest. Additionally, even assuming arguendo that Mills does teach or suggest data on a removable memory as suggested by the rejection, Mills still fails to teach or suggest a category listing as claimed.

Moreover, the rejection cites paragraphs 16 through 19 of Mills as teaching or suggesting “a name of a category associated with said removable memory” as claimed. Applicants find no such teaching or suggestion in the cited portion of Mills, and therefore, Applicants request clarification (in accordance

with MPEP §706.02(j)) on how this portion of Mills teaches or suggests a name of a category associated with a removable memory as claimed.

Applicants respectfully submit that Dumas, either alone or in combination with Mills, fails to cure the deficiencies of Mills discussed above with respect to independent Claim 11. Specifically, Dumas also fails to teach or suggest the limitations of “updating a displayable category list to comprise a name of a category associated with said removable memory” as recited in independent Claim 11.

For these reasons, Applicants respectfully submit that independent Claim 11 is not rendered obvious by Mills in view of Dumas, thereby overcoming the 35 U.S.C. §103(a) rejection of record. Since independent Claims 17, 22 and 29 contain limitations similar to those discussed above with respect to independent Claim 11, independent Claims 17, 22 and 29 also overcome the 35 U.S.C. §103(a) rejections of record. Since Claims 12-16, 18-21, 23-28 and 30-32 depend from and recite further limitations to the invention claimed in their respective independent Claims, Claims 12-16, 18-21, 23-28 and 30-32 also overcome the 35 U.S.C. §103(a) rejections of record. Therefore, Claims 11-32 are allowable.

CONCLUSION

Applicants respectfully submit that Claims 11-32 are in condition for allowance and Applicants earnestly solicit such action from the Examiner.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,

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